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July 18, 2025

VIA ECF

Hon. Dale E. Ho, USDJ
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Hon. Robert W. Lehrburger, USMJ
United States District Court for the Southern District of New York
500 Pearl St., Courtroom 1960
New York, NY 10007-1312

Re: Lee v. Delta Air Lines, Inc., Case No. 1:22-cv-08618-DEH-RWL

Your Honors:

We represent Defendant Delta Air Lines, Inc. (“Delta”) in the above-referenced action. We write, pursuant to Judge Lehrburger’s Order, dated October 23, 2024 (Dkt. 113), and Item 12 of Judge Lehrburger’s form Civil Case Management Plan and Scheduling Order, to notify the Court of Delta’s intent to file a motion for summary judgment as to all of Plaintiff’s remaining claims in this action. Delta understands that—pursuant to Item 12 of Judge Lehrburger’s form Civil Case Management Plan and Scheduling Order—the operative deadline for filing such motion is August 18, 2025, which is 30 days following the close of discovery, i.e., today.

* * *

We thank the Court in advance for its consideration of Delta’s forthcoming submission.

Respectfully submitted,



/s/ Michael F. Fleming

Michael F. Fleming

C: Plaintiff (via ECF; email)

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